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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES <i>ex rel.</i> BONNIE	)	NO. CV 08-3411 WHA (DMR)
LAMMERS, M.D.,	)	
	)	<b>STIPULATION OF DISMISSAL;</b>
Plaintiff and Relator,	)	<b>[PROPOSED] ORDER</b>
	)	
v.	)	
	)	
FARIDEH HEIDARPOUR; ALI	)	
HEIDARPOUR; and A.B.C. BILLING, INC.	)	
	)	
Defendants.	)	

Subject to the Court's approval, IT IS HEREBY STIPULATED by the United States of America, the qui tam Relator Bonnie Lammers, and the Defendants Farideh Heidarpour, Ali Heidarpour, and A.B.C. Billing, Inc. (collectively, the Parties), through their undersigned counsel, that:

1. Pursuant to Fed. R. Civ. R. 41(a)(2) and the terms of the August 28, 2013 settlement agreement executed by the Parties, the United States and the Relator hereby dismiss the above-captioned action without prejudice.

2. Upon receipt of all of the payments described in the August 28, 2013 settlement agreement, the United States and the Relator will file a stipulation dismissing the action with prejudice.

IT IS SO STIPULATED.

Respectfully submitted,

MELINDA HAAG  
United States Attorney

Dated: September 6, 2013

By: \_\_\_\_\_/s/ signature on file  
SARA WINSLOW  
MELANIE L. PROCTOR  
Assistant United States Attorneys  
Attorneys for the United States

MCBREEN & SENIOR

Dated: September 6, 2013

By: \_\_\_\_\_/s/ signature on file  
MATTHEW WESTON  
Attorney for Relator

ROGERS JOSEPH O'DONNELL

Dated: September 3, 2013

By: \_\_\_\_\_/s/ signature on file  
PATRICIA A. MEAGHER  
Attorney for Defendant

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that this action is dismissed without prejudice.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE WILLIAM H. ALSUP  
United States District Judge